

Exhibit U

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERIC WILKINS et al.,

Plaintiff,

V.

CITY OF CHICAGO et al.

Defendant.

Civil Action No. 23-cv-04072

AMENDED RESPONSE TO SUBPOENA DUCES TECUM

NOW COMES, Keeper of Records for the Chicago Police Captains' Association, by the undersigned attorney, and in their amended response to a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action requested by Arnold & Porter Kaye Scholer LLP, states as follows:

1. All Documents and Communications containing training, policies, practices, guidelines, guidance, or advice relating to traffic stops and/or vehicle stops, for the period 2016- present.

RESPONSE: Deponent does not possess any relevant documents pertaining to this request.

2. All Documents and Communications relating to any form of goal, quota, activity metric or expectation, or minimum number, of traffic stops and/or investigatory stops expected by, established by, or proposed by any Chicago Police Department members (including but not limited to the Superintendent and/or exempt members) in the time period 2016-present.

RESPONSE: Deponent does not possess any relevant documents pertaining to this request.

3. If not otherwise produced in response to Request 2, all Documents and Communications prepared by You in response to any form of goal, quota, activity metric or expectation, or minimum number, of traffic stops and/or investigatory stops expected by, established by, or proposed by any Chicago Police Department members (including but not limited to the Superintendent and/or exempt members) in the time period 2016-present. The Documents and Communications responsive to this request include, but are not limited to, press releases, public statements, interviews, emails, memoranda, newsletters, announcements, social media or blog posts, and all other Documents and Communications as defined above.

RESPONSE: Deponent does not possess any relevant documents pertaining to this request.

4. All Documents and Communications reflecting any grievances, responses to grievances, and appeals thereof, relating to any form of goal, quota, activity metric or expectation, or minimum

number, of traffic stops and/or investigatory stops expected by, established by, or proposed by any Chicago Police Department members (including but not limited to the Superintendent and/or exempt members) in the time period 2016-present.

RESPONSE: Deponent does not possess any relevant documents pertaining to this request.

5. All Documents and Communications reflecting any complaints, disputes, or charges between union members regarding any violation of union bylaws, the collective bargaining agreement, or any other governing document, including any appeals thereof, relating to any form of goal, quota, activity metric or expectation, or minimum number, of traffic stops and/or investigatory stops expected by, established by, or proposed by any Chicago Police Department members (including but not limited to the Superintendent and/or exempt members) in the time period 2016-present.

RESPONSE: Deponent does not possess any relevant documents pertaining to this request.

All Documents sufficient to identify, by name and mailing address, the individual who appears as "John D..." with the email address "stopfor2@hotmail.com" reflected on the attached email chain produced by the City of Chicago in this matter with the Bates number CITY00837117-20.

RESPONSE: Objection. Documentation sought is protected by Employee-Union Rep Privilege. See redacted email-chain. Redacted portion is protected by Employee-Union Rep Privilege. Without waiving said privilege, the E-Mail address belongs to John Doherty. He may be contacted through the Chicago Police Department: 3510 S. Michigan Avenue, Chicago, IL 60653.

6. All Documents and Communications relating to, responding to, or continuing the attached email chain produced by the City of Chicago in this matter with the Bates number CITY00837117-20.

RESPONSE: Objection. Documentation sought is protected by Employee-Union Rep Privilege. Without waiving said objection, see redacted privilege e-mail chain. Redacted portion is protected by Employee-Union Rep Privilege.

Respectfully submitted,

By: /s/ Jason W. Lee
Attorney for Chicago Police Captains' Association

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused to be served a copy of the foregoing **AMENDED RESPONSE TO SUPOENA DUCES TECUM** on the following individual by electronic mail on December 17, 2025:

Arnold & Porter Kaye Scholer LLP
Attn: Daniel Raymond
70 West Madison Suite 400
Chicago, IL 60602
Daniel.raymond@arnoldporter.com

By: /s/ Jason W. Lee
Attorney for Police Captains' Association